

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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UNITED STATES OF AMERICA,

ORDER

-against-

09 **CR.** 1082 (RMB)

CAMERON DOUGLAS,

Defendant.

-----X

The Court is in receipt of emails, dated June 29, 2020 and July 8, 2020, regarding Mr. Douglas' vacation travel plans for July 2020 (copies attached). It is preferable that counsel make any request to the Court in writing and file such written request on the public docket, rather than use email.

The Court previously authorized Mr. Douglas' one month trip to Spain, commencing June 30, 2020. See Order dated June 29, 2020. [#321] It does not appear to the Court that any additional orders are necessary with respect to the proposed vacation.

Dated: New York, New York
July 8, 2020



RICHARD M. BERMAN, U.S.D.J.

Activity in Case 1:09-cr-01082-RMB USA v. Sott et al Order on Letter

Andrea Zellan <AZellan@braflaw.com>

Mon 6/29/2020 10:52 AM

To: Christine Murray <Christine_Murray@nysd.uscourts.gov>; Chelsea Tabolt <Chelsea_Tabolt@nysd.uscourts.gov>

Cc: Randy Orlow <Randy_Orlow@cacp.uscourts.gov>; Noah Joseph <Noah_Joseph@nysp.uscourts.gov>

Ms. Murray and Ms. Talbot,

On behalf of Mr. Douglas we would like to express great appreciation for the Court's modifications to the terms of Mr. Douglas's supervised release.

I already have a question regarding Judge Berman's Order. As Judge Berman predicted during our tele-conference on June 25, 2020, Mr. Douglas and his family have learned that they cannot go to Spain due to COVID-19. Instead, with the Court's permission, Mr. Douglas would travel to Bermuda with his partner, Vivian Thibes, his daughter Lua, his father, step-mother and brother, and I believe his uncle. They will be departing today with the Court's permission and the detailed flight itinerary was sent to Officer Orlow.

Its my understanding They are traveling via Atlantic Aviation at 9am Pacific Time.

Should I submit an email correspondence directly to Judge Berman regarding this change of travel circumstances?

Best Regards,

ANDREA ZELLAN, ESQ.

Brafman & Associates, P.C.

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FW: Activity in Case 1:09-cr-01082-RMB USA v. Sott et al Order on Letter

Christine Murray <Christine_Murray@nysd.uscourts.gov>

Wed 7/8/2020 2:46 PM

To: Chelsea Tabolt <Chelsea.Tabolt@nysd.uscourts.gov>

From: Andrea Zellan <AZellan@braflaw.com>

Sent: Wednesday, July 8, 2020 11:14 AM

To: Christine Murray <Christine_Murray@nysd.uscourts.gov>

Cc: Randy Orlow <Randy_Orlow@cacp.uscourts.gov>; Noah Joseph <Noah_Joseph@nysp.uscourts.gov>; Jessica.Greenwood@usdoj.gov

Subject: RE: Activity in Case 1:09-cr-01082-RMB USA v. Sott et al Order on Letter

Good morning Ms. Murray.

I am following up, again, regarding Mr. Douglas's travel request, travel plans, and Judge Berman's June 29, 2020 Order. I have copied the government, Officer Orlow and Officer Joseph on this email.

Mr. Douglas and his family are currently in Bermuda and following all of Bermuda's COVID -19 procedures. They are required to have four negative COVID-19 test results over 14 days before they can move about Bermuda freely.

Mr. Douglas and his family are hoping that they may yet have a chance to go to Majorca, Spain. If Spain will admit them from Bermuda, and if the Court permits, Mr. Douglas together with Ms. Thibes, their daughter, his father, step-mother and sibling would travel by private jet from Bermuda to Spain on July 15 or July 16 and would reside in the family residence on Majorca. On July 30, 2020 the entire family would return to New York City via private jet. Mr. Douglas, Ms. Thibes and their daughter will then travel via commercial airline from New York City home to Los Angeles.

Mr. Douglas is aware that the COVID 19 pandemic in the United States and worldwide is an evolving situation and these potential plans may fall through for that reason. However, he wants to present the possibility to the Court now, to find out if the Court will grant him permission to make these additional changes to his travel plans if it turns out that the family can make the trip to Spain and be admitted to Spain.

If Judge Berman approves this additional modification, Mr. Douglas will provide a specific itinerary with flight details to Officers Orlow and Joseph and to the Court as directed.

We greatly appreciate the Court's consideration and patience.

Regards,

ANDREA ZELLAN, ESQ.

Brafman & Associates, P.C.

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